

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

Plaintiff *

v. * Civil No. JFM-12-CV-002034

\$157,000.74 in U.S. CURRENCY

Defendant *

* * * * * * * * * * * * * * * *

VERIFIED CLAIM

Y.S. Enterprises, Inc., by and through their undersigned counsel and on behalf of the Defendant property \$157,000.74 in U.S. currency (the “Property”), and pursuant to Supplemental Rule G(5) of the Federal Rules of Civil Procedure, hereby files this Verified Claim, and states:

NATURE OF THE ACTION

1. The United States initiated a civil *in rem* forfeiture action against the Property alleging that the Property was involved in violations of 31 U.S.C. § 5324(a) and therefore, is subject to forfeiture pursuant to 18 U.S.C. § 981 and 31 U.S.C. § 5317(c)(2).

CLAIMANTS

2. Claimant, Y.S. Enterprises, Inc. ("Y.S."), is a Maryland corporation with its principal place of business in Hyattsville, Maryland.

THE PROPERTY

3. The Property is \$39,000.74 in U.S. currency seized on February 24, 2010 from account number 446022297659 at Bank of America (the "BOA Account") and \$118,000.00 in U.S. currency seized from the Galaxy Sports Bar & Grill (the "Galaxy") at 2031 University Boulevard East, Suite B.

CLAIMANT'S INTEREST IN THE PROPERTY

4. Y.S. owns and operates the Galaxy in Hyattsville, Maryland.
5. The Property seized from the BOA Account and the Galaxy is revenue derived from the legitimate business activity of the Galaxy.
6. Claimant claims lawful ownership of the Property.
7. The Property is not subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2).
8. Claimant demands its immediate return.

Respectfully submitted,

/s/
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*Attorneys for Defendant Property and
Claimant Y.S. Enterprises, Inc.*

VERIFICATION

I attest and declare under penalty of perjury that the claim to this property is not frivolous and that the information provided in support of our claim is true and correct to the best of my knowledge and belief.

Y.S. Enterprises, Inc.

By:



Byong Soo, President

4851-4267-3168, v. 1



Date